

TESTIMONY OF SCOTT W. JACKSON

TABULATION OF FOURTH QUARTER, 1991 PROBLEMS

TRINITY BROADCASTING OF MONROE/ATLANTA
DESIGNATION OF TOP COMMUNITY PROBLEMS

FROM THE AVAILABLE SOURCES

IN THE CHANNEL 63

VIEWING AREA

OCTOBER, NOVEMBER, DECEMBER 1991

✓ EDUCATION/SCHOOLS	21
✓ HEALTH	25
✓ DRUG/ALCOHOL ABUSE	23
✓ HOMELESS	20

TABULATION OF ASCERTAINMENTS

PROBLEMS/ ISSUES	RESPONSES FROM CIVIC LEADERS	PRINTED MEDIA PUBLS	T.V./ RADIO	VIEWERS' PHONE RESPONSES	S.A. CITY CNCL AGENDA
ABORTION	11 (2)	3			
AIDS	111111 (12)	10			
CHILD ABUSE	111 (3)	4			
CHILD CARE	11111 (7)	7			
COST OF LIVING/INFLA- TION/POVERTY	111111 (8)	10			
CRIME	1111111111 (16)	36			
DRUGS/ALCOHOL ABUSE	1111111111111111 (23)	24			
DISCRIMINA- TION/MINORITY	11 (2)	14			
FAMILY/SINGLES	11111111 (12)	7			
GOVT/STATE/FED	1111111 (11)	77			
EDUCATION/ SCHOOLS	1111111111111111 (20)	51			
HEALTH CARE	1111111111111111 (25)	14			
HOMELESS	1111111111111111 (26)	19			
HOUSING	1111111 (6)	36			
IMMIGRATION		1			
POLUTION/ ENVIRONMENT	1111111111111111 (14)	21			
SR CITIZENS/ AGING	11 (2)	5			
TRANSPORTATION	1111111111111111 (9)	12			
UNEMPLOYMENT	1111111111111111 (14)	13			
YOUTH/GANGS	1111111111111111 (12)	8			
CIV RIGHTS		4			

POLUTION/ ENVIRONMENT		(4)	21		
SR CITIZENS/ AGING		(2)	5		
TRANSPORTATION		(9)	12		
UNEMPLOYMENT		(14)	13		
YOUTH/GANGS		(12)	8		
GAY RIGHTS			4		
WATER			0		
MARRIAGE/DIV			0		
GROWTH/POPULA- TION			4		
HOMOSEXUALITY			0		
PORNOGRAPHY			0		
SEP OF CH/STATE			0		
APATHY		(9)	0		

CORRECTIONS

A comparison of the WHSB-TV program logs and the Quarterly Reports shows that the following program episodes listed in WHSB-TV's Quarterly reports did not air at the time and date indicated on the Quarterly Reports.

<u>Program Name</u>	<u>Episode No.</u>	<u>Date</u>	<u>Time</u>
The 700 Club	424-91	4/21/91	3:00 p.m.
Feedback	160	4/26/91	12:00 p.m.
Treasures out of Darkness	18	4/26/91	5:30 p.m. 2:00 a.m.
A Date With Dale	121	5/21/91	8:00 p.m.
Feedback	175	7/11/91 8/1/91	8:30 p.m. 8:30 a.m.
The 700 Club	728-91	7/28/91	3:00 p.m.
Feedback	175	8/1/91	8:30 a.m.
Calling Dr. Whitaker	467	8/14/91	2:30 a.m. ¹
Calling Dr. Whitaker	471	10/2/91	2:00 p.m.
Feedback	180	10/10/91	*.30 ²
The Dr. and the Word	74	10/14/91	2:30 p.m.
The Dr. and the Word	75	10/28/91	2:30 p.m.
Treasures Out of Darkness	30	11/18/91	5:30 a.m. 2:00 a.m.
The Dr. and the Word	85	12/2/91	2:30 p.m.

¹. Calling Dr. Whitaker is shown on the station logs of August 14, 1991 as being broadcast at 2:00 a.m., which means that the program was actually broadcast on August 15, 1991.

². Feedback was not broadcast on October 10, 1991.

A Call To Action	105	1/1/92	8:30 p.m.
		1/5/92	12:30 p.m.
The 700 Club	199-92	1/16/92	3:00 p.m. ³
Calling Dr. Whitaker	491	2/12/92	2:00 a.m.
Calling Dr. Whitaker	492	2/19/92	2:00 p.m. ⁴
Praise The Lord	0219-92	2/19/92	10:00 p.m. ⁵
Calling Dr. Whitaker	493	2/25/92	11:30 a.m. ⁶
The Dr. and the Word	88	3/30/92	11:30 a.m.

³. The 700 Club did air on that time and date. WHSG-TV's program logs show that the episode aired was labeled "19191" rather than "199-92" shown on the Quarterly Report.

⁴. The Station logs show that this episode of Calling Dr. Whitaker was broadcast on February 25, 1992 at 11:30 a.m.

⁵. A Praise The Lord program was broadcast at this time and date, but it was a live PTL production, not the program described in the Quarterly Report.

⁶. As noted in footnote 3, above, episode number 492 of The Doctor and the Word aired at this time and date.

TESTIMONY OF LINDEE C. CONNOLLY

1. My name is Lindee C. Connolly. I live at 26695 Thunderbird Drive, Lake Arrowhead, California, 92352. I am presently employed by my mother doing interior decorating work. I worked for Trinity Broadcasting Network ("Trinity" or "TBN") off and on in several different capacities from 1979 to 1992. During the WHSG-TV license term, from February 22, 1991 through the end of February, 1992 (hereinafter, the "License Term"), I was Network Program Director.

2. During the WHSG-TV License Term, my duties and responsibilities remained essentially the same. It was my responsibility to know what problems and issues were important to the communities served by TBN owned stations, to research particular topics and issues to determine who might be a good guest to interview with respect to that topic or issue, and then book guests for TBN's programming, with particular emphasis on its public affairs or talk show programming. Throughout the WHSG-TV License Term I reported directly to Dr. Paul Crouch, president of TBN.

3. My responsibilities in this regard did not include scheduling guests for the Praise the Lord ("PTL") program. I would, on occasion, assist by booking guests for PTL at Mrs. Crouch's request, but the primary responsibility for that show has always been Mrs. Crouch, assisted by Laura Massey. It was also my responsibility to review and approve proposed topics and guests for TBN's public affairs shows such as Feedback, which was produced by the staff of WHFT in Miami, Florida, and for Joy.

Federal Communications Commission

Docket No. 93-194 Exhibit No. 33

Presented by Trinity

Disposition { Identified 5-17-94
Received 5-17-94
Rejected _____

Reporter AMW

Date W 5-17-94

4. I would periodically meet with the three or four people in the production department, particularly those who were writing continuity for TBN produced programs, to tell them what problems and issues the TBN owned stations had reported were most important, and to direct them concerning what they were to look for in doing continuity for our programs. I also posted the lists of problems from each community, which were generated as described below, in the Director's Booth where the continuity people did their job. Our staff did continuity on all Trinity programming produced in California as well as for The 700 Club which was sponsored by another ministry. Continuity for programs which were produced by other TBN stations was supposedly done by the station at which the program was produced. I say "supposed" because I really don't know if such continuity was taken. No continuity was done for any non-TBN produced program except The 700 Club. That meant that there was no continuity taken on programs produced in Atlanta by other ministries, such as Rev. Charles Stanley's In Touch program, and Bishop Earl Paulk's show, but which were shown on the network.

5. Technically my responsibilities included supervising those in the traffic department who prepared each station's logs and transmitting them to the station. I did not review each station's logs before they were sent to them, and I did not spend much time on that responsibility because the procedure was established and did not require my personal involvement.

6. During the License Term, WHSG-TV and other TBN owned stations did ascertainments in their local service area.

Information concerning the problems and needs of each community identified during the ascertainment process was transmitted by each station to the TBN public affairs department. Mrs. Jane Duff was generally responsible for the Public Affairs Department, and supervised the Public Affairs Director. During the WHSG-TV License Term, first Deanna Sebastian and then Dixie West, in the Fall of 1991, served as the Public Affairs Director. It was the Public Affairs Director's job to supervise the ascertainment process for each station and to provide me, on a regular basis, at least twice each calendar quarter, with a list of at least five problems in the order of their importance identified by each station's ascertainment in their service area. I did not do any ascertainment myself, but I know what the standard procedure was for determining each service area's problems and needs. This procedure involved reading local newspapers to determine local problems and telephone interviews with community leaders. During the license term I received a preliminary report of each station's problems, including WHSG-TV's, soon after the beginning of each calendar quarter, and a final report at the end of each calendar quarter.

7. Both the preliminary and final reports would include a written list of at least the top five problems identified by each station in its service area. In addition to these written lists, I would on occasion be contacted by Mrs. Duff or by the Public Affairs Director who would tell me that a particular problem or issue had come up in a particular community that needed to be

covered on a program. I used both the lists of problems and the oral reports and suggestions from the Public Affairs Department as the basis of my research and to schedule guests for particular shows. I would book guests to discuss or treat a particular problem on the lists of problems from the various stations. Usually there was a great deal of agreement, or overlap, concerning the most important problems in the various communities. If, as was usually the case, the topic on which a guest was to be interviewed was both a problem local to the KTNB, Santa Ana, California service area and a problem in a number of communities served by our stations, I requested guests who were to be interviewed to discuss the problems from both a local and a national viewpoint. For example, if a guest were discussing the Neighborhood Watch Program, I would ask the guest as well as the host to be sure to discuss how to either get in touch with the program in their community, or how to start the program in their community. In this way the guest's interview would be responsive to both the crime problem in the local service area as well as in other communities, like Atlanta/Monroe, in which the program aired.

8. During each quarter my first priority in scheduling guests would be to treat the top five problems identified by all of the stations. These top five problems were pretty much treated equally. I would then schedule guests to treat the other problems mentioned on the lists for each station. Each quarter I made sure that I scheduled a guest on a program to discuss every problem on the list of problems for each station. I kept a chart or graph of

the problems identified by each community, such as Atlanta/Monroe, and of each show produced which treated one of the problems to ensure that each problem was treated thoroughly during the quarter. Unfortunately, this documentation no longer exists. As I mentioned above, on occasion, Mrs. Duff or someone from the Public Affairs Department would call to tell me that there was a particular problem that had been identified in a particular community, or there was a particular event, such as civil unrest, that created a special need for programming to treat that need. Dr. Crouch or Mrs. Crouch would also, on occasion, tell me of a particular need in a particular community to which we needed to respond. In those instances I would ensure that that particular problem was treated, sometimes several times, on one of the programs for which I scheduled guests. This sort of request, asking for a response to a particular problem in a particular community, occurred with some regularity. I don't now remember, however, any particular instance where I scheduled guests to treat an issue which was peculiar to the WHSG-TV service area, although I am certain I did so during the License Term. In fact, I can't now remember any specific problem or issue which I can identify with WHSG-TV. I am certain, however, that I received lists of problems/issues for WHSG-TV after it went on the air. I also have a specific recollection of the station being listed on my grids showing problems and the guests invited to discuss the problem, so I am certain that I scheduled guests on TBN programming to respond to problems and needs identified by WHSG-TV's service area needs.

9. We were always informed when a TBN owned station went on the air. I was also aware that when it went on-the-air WHSG-TV was not broadcasting any local programming because TBN had not yet built its local studio. It was my job to make sure that our programming responded to the needs of the communities served by TBN's stations. I was conscientious about scheduling guests to meet each station's problems, and I was particularly sensitive to this responsibility when the station, like WHSG-TV, had no local studio and was dependent on network programming to respond to the community's problems and needs.

10. Once I was finished with my review of the topics and guests I submitted the program topics and guests to Dr. Crouch and Mrs. Crouch for their approval. The program guests were booked based on their approval. My approval was strictly based on the list of problems identified in the preliminary and quarterly reports of problems in each of TBN's stations' communities.

11. Among the network programs that I booked guests for was the program Joy, which during most of the License Term was an hour long interview show hosted by Rev. Jim McClellan. Since the purpose of Joy was to deal with community problems, the topics discussed and the guests were always chosen with reference to the lists of community problems, including those from WHSG-TV's service area. Again, I do not remember a specific instance when I can remember booking a guest in response to a particular need identified in the WHSG-TV service area, but I am certain that I did so. In booking guests I would always refer to the problems

identified by all the stations. Since the program was produced in Southern California we had a tendency to treat the problems identified within KTVB's local area first, but during the taping sessions problems identified by all communities would be treated, even if a particular problem was not pertinent to Southern California. As I mentioned above, if a particular problem was identified by a number of communities as well as Southern California I would ask the guest to discuss the problem's local and national ramifications. For example, we might be doing a program concerning transportation problems by interviewing a director of Orange County transportation. In addition to the local aspects of the problems, however, we would make sure that the guest also commented on the issue from a national viewpoint, such as how Orange County's transportation problems compared to other communities or how the lessons learned in dealing with Orange County's transportation problems could be applied to transportation problems in other communities. On occasion we would do a Joy program to meet a specific need identified in one community that was not shared by other communities.

12. I booked guests during the license term for the program A Date With Dale, an interview show featuring Dale Evans Rogers. Since the emphasis of the show was more on entertainment personalities who were known to Mrs. Rogers, I didn't always book guests based on their ability to discuss a problem on my lists, as I did with Joy. Treating problems was always a concern of mine, however, and I did refer to the lists of problems where I could,

and I always preferred booking a guest who could discuss one of the problems on my lists to one who could not.

13. During the License Term Trinity produced a program entitled Back on Course, hosted by Gavin and Patty Macleod, which dealt with family issues such as divorce, family finances, spouse abuse, alcoholism, etc. I would be involved in choosing a topic for a program and for research to find the right guest for a particular topic, such as the healing of troubled marriages and so forth. In formulating topics for discussion and in scheduling guests I would rely on the lists of problems compiled from each station's service area, including WHSG-TV's. Likewise, during WHSG-TV's License Term I would ask the host of Doctor and the Word to discuss a specific issue or topic based on the lists of problems for each station. Since the program's format relied on the host's discussion of a topic, and infrequently used guests as part of the program format, we had to rely on the host to discuss the problem.

14. During the WHSG-TV License Term TBN produced a program called Calling Doctor Whitaker which dealt primarily with health issues, such as nutrition, aging, the health problems of senior citizens and youth, drug and alcohol abuse, and pollution as it relates to a person's health. The program was produced at various stations during the license term, including: KTBO-TV, Oklahoma City, Oklahoma; KDTX-TV, Dallas, Texas; and, KTBN, Santa Ana, California. On occasion I would ask Dr. Whitaker to discuss or cover a particular topic or issue because that topic or issue was included on the lists of problems identified by TBN's stations'

service areas, such as WHSG-TV.

15. I was also involved in reviewing and approving topics for discussion and guests on The Treasures Out of Darkness program, hosted by Sonny and Julie Arguinzoni. I did not book the guests for this show, but I generally received and reviewed a list of proposed topics to be discussed and guests prior to production. Once again, I reviewed these guests and topics to determine if they would be responsive to the problems identified by all of the stations.

16. The producers of A Call To Action, a public affairs program dealing with contemporary legal issues, also sent our office lists of topics and guests for our approval. I reviewed this information to determine if the show contemplated was responsive to one or more of the problems identified, and referred the list to Dr. and Mrs. Crouch for their approval. At times, I scheduled guests for the program, and when I did I booked guests based on the lists of problems identified by communities such as WHSG-TV's service area. The producers of the show, who, like Mr. Sekulow, live and work in Atlanta, booked most of the guests for the show, however.

17. Network programming had spots for the insertion of network public service announcements (PSA). I also approved network PSAs and identified the time blocks or programming blocks in which the PSAs could most appropriately be broadcast. For example, I made sure that PSAs that dealt with children's issues, or child safety issues, were broadcast during times when the network was

broadcasting children's programming. I would try to choose PSAs to match the problems identified by the communities each quarter, and, on occasion scheduled PSAs to respond to problems that I knew from experience would come up in the next quarter. On occasion, when I became aware of a specific problem in a community that needed response, I would schedule a specific PSA to deal with that problem, or, if we were already running a PSA responsive to that problem, I would schedule the PSA to run with greater frequency.

SUPPORTING DECLARATION

I, Lindee C. Connolly, hereby swear under penalty of perjury of the laws of the United States and the State of California, that the foregoing "Testimony of Lindee C. Connolly," consisting of 10 pages, was prepared by me for submission to the Federal Communications Commission in connection with MM Docket No. 93-156, and that my testimony is true and accurate to the best of my knowledge and belief.

Executed this 20th day of April, 1994.

Lindee C. Connolly
Lindee C. Connolly